

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

CarePoint Health Systems Inc. d/b/a Just Health
Foundation, et al.,¹

Debtors.

x Chapter 11
: Case No. 24-12534 (JKS)
:
: (Jointly Administered)
:
:
v

**AMENDED² NOTICE OF AGENDA REGARDING MATTERS SCHEDULED FOR
HEARING ON
JANUARY 23, 2025 AT 1:00 P.M. (ET)³**

This proceeding will be conducted **in-person**.

All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.

Please refer to Judge Stickles' Chambers Procedures

(<https://www.deb.uscourts.gov/content/judge-j-kate-stickles>) and the Court's website (<http://www.deb.uscourts.gov/ecourt-appearances>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the hearing unless otherwise noticed using the [eCourtAppearances](#) tool available on the Court's website.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

² All amendments are highlighted in **Bold**.

³ All motions and other pleadings referenced herein are available online at the following web address:
<https://dm.epiq11.com/CarePoint>

I. MATTERS GOING FORWARD

1. Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/08/2025; D.I. [417](#)].

Related Documents:

- A. Notice of Filing of Plan Term Sheet [Filed: 12/30/2024; D.I. [378](#)].
- B. Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 01/08/2025; D.I. [412](#)].
- C. Order Granting Motion to Shorten Notice and Schedule Expedited Hearing with Respect to Motion of the Debtors and The Official Committee of Unsecured Creditors Seeking Authority to File Combined Disclosure Statement and Plan [Filed: 01/08/2025; D.I. [419](#)].
- D. First Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 01/16/2025; D.I. [497](#)].
- E. CarePoint Liquidation Analysis [Filed: 01/16/2025; D.I. [498](#)].
- F. Redline of First Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 01/16/2025; D.I. [499](#)].

Objection Deadline: January 15, 2025 at 10:00 a.m.

Responses:

- G. Objection of Senior Secured Agents to Interim Approval of Plan Proponents' Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 01/15/2025; D.I. [458](#)].
- H. Objection of Senior Secured Agents to Plan Proponents' Proposed Confirmation Schedule [Filed: 01/15/2025; D.I. [459](#)].
- I. Insight Management and Consulting Services, Inc.'s Objection to the Debtors' Motion (I) Approving the Combined Disclosure Statement and Plan on an Interim Basis for Solicitation Purposes Only; (II) Establishing Solicitation and Tabulation Procedures; (III) Approving the Form of Ballot and Solicitation Materials; (IV) Establishing the Voting Record Date; (V) Fixing the Date, Time, and Place for the Combined Hearing and the Deadline for Filing Objections Related Thereto; and (VI) Granting Related Relief [Filed: 01/15/2025; D.I. [460](#)].

- J. Objection and Reservation of Rights with Respect to motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [462](#)].
- K. Objection and Reservation of Rights of Creditor, Resolute Perioperative Services, LLC to the Debtors and the Official Committee of Unsecured Creditors' Joint Motion for the Entry of an Order Approving the Combined Disclosure Statement and Chapter 11 Plan of Reorganization [Filed: 01/15/2025; D.I. [463](#)].
- L. Reservation of Rights of J2 Funding, LLC, Signature RX Investments, LLC, and Bills Right LLC to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [464](#)].
- M. Objection of CarePoint Health Captive Assurance Company, LLC to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of an Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [466](#)].
- N. BMC Hospital, LLC's Objection to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [467](#)].
- O. Objection and Reservation of Rights to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the

Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [468](#)].

P. Objection of the U.S. Trustee to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [469](#)].

Q. Objection and Reservation of Rights with Respect to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [470](#)].

R. Response of the New Jersey Department of Health to the Plan Proponents' Motion for Entry of an Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [471](#)].

S. Declaration of James P. Flynn In Support of BMC Hospital, LLC's Objection to Motion of the Debtors and the Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [472](#)].

T. The County of Hudson's Limited Objection and Reservation of Rights to Debtors and Official Committee of Unsecured Creditors for Entry of Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [474](#)].

U. Preliminary Objection, Joinder, and Reservation of Rights of Dr. Vijayant Singh, in His Capacity as Relator, to Motion of the Debtors and Official Committee of Unsecured Creditors for Entry of Order (I) Approving the

Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/15/2025; D.I. [475](#)].

- V. Strategic Ventures LLC's (I) Objection to (A) Interim Approval of Plan Proponents' Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization and (B) Proposed Confirmation Schedule, and (II) Reservation of Rights [Filed: 01/16/2025; D.I. [496](#)].
- W. Supplemental Objection of Maple Healthcare [Filed: 01/17/2025; D.I. [507](#)].
- X. Pennsylvania Manufacturers' Association has informally objected and reserved rights.

Additional Related Documents:

- Y. **Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 01/21/2025; D.I. [522](#)].**
- Z. **Proposed Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/22/2025; D.I. [525](#)].**

Status: This matter is going forward.

Dated: January 22, 2025

DILWORTH PAXSON LLP

/s/ Peter C. Hughes

Peter C. Hughes (DE 4180)
800 N. King Street, Suite 202
Wilmington, DE 19801
Telephone: 302-571-9800
Facsimile: 302-571-8875
Email: phughes@dilworthlaw.com

and

Lawrence G. McMichael (admitted *pro hac vice*)
Peter C. Hughes (DE 4180)
Anne M. Aaronson (admitted *pro hac vice*)
Jack Small (admitted *pro hac vice*)

1650 Market St., Suite 1200
Philadelphia, PA 19103
Telephone: (215) 575-7000
Facsimile: (215) 754-4603
Email: lmcmichael@dilworthlaw.com
Email: phughes@dilworthlaw.com
Email: aaaronson@dilworthlaw.com
Email: jsmall@dilworthlaw.com

Counsel for the Debtors